



March 30, 2010

Rodd Mas, Manager
Operations AHCCCS/DHCM/Acute Care
701 E. Jefferson
Phoenix ,AZ 85034

RE: Corrective Action Plan (CAP) marketing violation

Dear Mr. Mas:

Bridgeway Health Solutions is submitting the following corrective action plan (CAP) in response to the notification received from AHCCCS on March 16, 2010 regarding a brochure from the Disability Empowerment Center Health and Wellness Fair 2010, displaying Bridgeway's logo, which was not submitted to the Marketing Committee for approval prior to distribution as required in AHCCCS ACOM Policy 101. The following CAP provides action steps, names of responsible parties and timeframes to prevent this from reoccurring in the future:

Staff Education:

Bridgeway's Compliance Officer provided re-education to staff members directly involved with marketing, outreach, and retention efforts. The education/discussion took place on Thursday, March 25, 2010 and included distribution of the AHCCCS ACOM Policy 101 for reference and discussion [attestation of participants is attached]. Discussion items included review of the purpose of the policy and the definitions; the written description of the policy, and the procedures for contractor (Bridgeway) submissions. Staff members included in the education/training included:

- Jennifer Klein, Member Services Supervisor (and Marketing/Outreach Coordinator)
- Lupita Carranza, Manager of Provider Services, Yuma
- Rhoda Hernandez, Supervisor of Case Management, Yuma
- Robin Johnson, Director Case Management, Prescott
- Juanita Setzer, Member Connections Representative, Prescott
- Mary Reiss, Director Case Management, Tempe
- Debra Tellez, Manager Case Management, Tempe
- Kimberly Gaunt, Supervisor Case Management, Tempe
- Elaine Teune, Director Provider Services, Tempe

Bridgeway Internal Process Enhancements:

Bridgeway Health Solutions has also appointed Jennifer Klein (Member Services Supervisor) to serve as Bridgeway's Marketing/Outreach Coordinator to work directly with the Bridgeway Compliance Officer to ensure the following:

- Consistency in submitted information from remote locations/lines of business;
- Submitted materials are in compliance with the policy,
- Requests are submitted in a timely manner; and
- Track incoming requests and follow-up submissions

Jennifer Klein will also meet with the Compliance Officer on a weekly basis to review pending submissions, follow-up where appropriate or necessary, and schedule site visits to review Bridgeway displays or participation/sponsorship activities. Any identified areas of concern will be immediately corrected where possible and reported to the Bridgeway Compliance Officer for appropriate action.

Thank you for affording Bridgeway the opportunity to remedy this matter. We will continue to monitor this area, and conduct periodic follow-up training sessions and ensure any updates to the AHCCCS ACOM Policy 101 are distributed to staff.

Please feel free to contact me if you have any questions or require additional information regarding this CAP. I can be reached at 1-866-475-3129 x 26847.

Sincerely,



Nicole Larson
Bridgeway, V.P. of Operations and Compliance

cc: Rick Fredrickson, CEO, Bridgeway
Elaine Teune, Director of Contracting and Provider Relations
Mary Reiss, Director of Case Management (ALTCS)
Mark Brown, Director of Finance
Robin Johnson, Director of Medical Management
Gina Aker, Compliance Officer (AHCCCS/DHCM/Acute Care)
P.J. Schoenstene, Compliance Officer (AHCCCS/DHCM/ALTCS)

Attachments: Sign-in/Attestation – Training on AHCCCS ACOM Policy



Conducted on
Thursday
3/25/10

Attestation

The following individuals have attended training on, read, understand, and agree to comply with the AHCCCS ACOM Marketing Policy 101.

Elaine Teune, Director of Provider Services (Tempe)	<i>Elaine Teune</i>
Mary Reiss, Director of Case Management (Yuma and Tempe)	<i>Mary Reiss</i>
Debra Tellez, Manager of Case Management (Tempe)	<i>Debra Tellez</i>
Kimberly Gaunt, Supervisor of Case Management (Tempe)	<i>Kimberly Gaunt</i>
Jennifer Klein, Supervisor Member Services (and Marketing/Outreach Coordinator)	<i>Jennifer Klein</i>
Juanita Setzer, Member CONNECTIONS Representative (Prescott)	Attended via phone
Robin Johnson, Director of Case Management (Prescott)	Attended via phone
Rhoda Hernandez, Supervisor of Case Management (Yuma)	Attended via phone
Lupita Carranza, Manager of Provider Services (Yuma)	Attended via phone